

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

FINEMAN KREKSTEIN & HARRIS, P.C.

A Pennsylvania Professional Corporation

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Attorneys for Defendant Greystone Alliance, LLC

GILDA CARRERA,
Plaintiff

v.

GREYSTONE ALLIANCE, LLC,
Defendant

CIVIL ACTION

NO.

JURY TRIAL DEMANDED

NOTICE OF REMOVAL

Defendant GREYSTONE ALLIANCE, LLC ("Greystone"), by its undersigned counsel, hereby petitions this Court as follows, pursuant to 28 U.S.C. § 1441(b):

1. Greystone is a defendant in an action pending in the Superior Court of New Jersey, Hudson County, Law Division, Special Civil Part, Docket No. DC-024209-11 ("the State Court Action"). A true and correct copy of the Complaint in the State Court Action is attached hereto as Exhibit "A".

2. Plaintiff in the State Court Action is Gilda Carrera. See Exhibit "A".

3. Plaintiff's State Court Action alleges violations of the Fair Debt Collection Practices Act, 15 U.S.C. §§ 1692, et seq.

4. The State Court Action involves a question of federal law. Pursuant to 28 U.S.C. § 1441(b), “Any civil action of which the district court shall have original jurisdiction founded on a claim or right arising under . . . the laws of the United States shall be removable.”

5. Since this case arises out of an alleged violation of the Fair Debt Collection Practices Act, 15 U.S.C. §§ 1692, et seq., this Court may properly remove the State Court Action based on 28 U.S.C. § 1441(b).

6. This Notice has been filed with the Court within thirty (30) days after receipt of the Complaint by defendant Greystone.

WHEREFORE, defendant GREYSTONE ALLIANCE, LLC, prays that the State Court Action be removed from the Superior Court of New Jersey, Hudson County, Law Division, Special Civil Part, Docket No. DC-024209-11, to this Court for proper and just determination.

FINEMAN KREKSTEIN & HARRIS, P.C.

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Dated: December 21, 2011

CERTIFICATE OF SERVICE

I, JENNIFER TATUM ROOT, ESQUIRE, hereby certify that on this date I served a true and correct copy of the foregoing Notice of Removal by first class mail, postage prepaid, on the following:

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JENNIFER TATUM ROOT, ESQUIRE

Dated: December 21, 2011